

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

In re:

Rapid Metals, LLC,

Debtor.

Chapter 11

Case No. 23-46098-mlo

Hon. Maria L. Oxholm

**BANK OF AMERICA, N.A.'S LIMITED OBJECTION AND RESERVATION OF
RIGHTS WITH RESPECT TO DEBTOR'S MOTION FOR ENTRY OF AN ORDER
AUTHORIZING CONTINUED USE OF DEBTOR'S PREPETITION CASH
MANAGEMENT SYSTEM, BANK ACCOUNT, AND BUSINESS FORMS**

Bank of America, N.A. ("Bank of America"), by and through its attorneys, Dickinson Wright PLLC, hereby submits this Limited Objection and Reservation of Rights with respect to Debtor's Motion for Entry of an Order Authorizing Continued Use of Debtor's Prepetition Cash Management System, Bank Account, and Business Forms (ECF 35) (the "Motion"). Bank of America objects to the Motion insofar as the Motion abrogates or modifies various agreements with Bank of America governing the parties' relative rights and obligations related to the various bank accounts and other cash management services and fails to provide adequate protection for Bank of America's ongoing exposure related to the bank accounts. Bank of America is in the process of negotiating an Order granting the Motion with the Debtor and anticipates that the parties will ultimately agree as to an Order granting the Motion. In the event that the parties are unable to agree on an Order granting the Motion, Bank of America reserves all rights to object to the Motion.

Respectfully submitted,

DICKINSON WRIGHT PLLC

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Dated: August 1, 2023